

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FILED
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2005 FEB -3 P 12:26
U.S. DISTRICT COURT
DISTRICT OF MASS.

JUE ZHANG,

Plaintiff,

v.

C.A. NO. 04-12735PBS

MICHAEL P. GOLDFINGER, M.D., and

SHRAGA N. GOLDBERG, M.D.,

Defendants.

REQUEST FOR TRIBUNAL BY THE DEFENDANT,
SHRAGA N. GOLDBERG, M.D.,
PURSUANT TO M.G.L., CHAPTER 231, §60B

The defendant, Shraga N. Goldberg, M.D., hereby moves this Honorable Court to convene a Medical Malpractice Tribunal pursuant to M.G.L., Chapter 231, Section 60B, and states in support of this Motion the following:

1. This is an action that includes allegations of malpractice, mistake or error against a provider of health care;
2. The Complaint includes allegations of negligence;
3. The defendant is entitled by statute to a Tribunal hearing on the allegations that relate to its actions as a health care provider;
4. The defendant is a provider of medical and health care services to patients as defined in M.G.L. c. 231, § 60B;
5. The defendant is a radiologist;
6. Therefore, a board-certified radiologist is requested by the defendant to serve as the medical member of the Tribunal; and
7. The defendant Shraga Goldberg, M.D. is located in Suffolk County.

For the Defendant,
Shraga N. Goldberg, M.D.,
By his attorneys,

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